



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Alexis A. Lambert
Secretary

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

March 25, 2025

Sent electronically to: Clement.j.hilton@chemours.com

Mr. Clemont J. Hilton
Vice President, Mineral Business
The Chemours Company FC LLC
Post Office Box 753
Starke, Florida 32091

**Re: Warning Letter No. WL25-092
Florida Mine – Trail Ridge South
Facility ID No. FL0A00014
Environmental Resource Permit MMR_137482-018
Unauthorized discharge, SWO# 2025-1502
Clay and Bradford Counties**

Dear Mr. Hilton:

On February 17, 2025, the Florida Department of Environmental Protection (“Department”) was notified by the State Watch Office (“SWO”) that your facility, Florida Mine – Trail Ridge South (Facility ID No. FL0A00014 and Environmental Resource Permit MMR_137482-018) had an unauthorized discharge of approximately 230,000 gallons of untreated industrial wastewater. The Department conducted an inspection at your facility on February 21, 2025, under the authority of Sections 373.423, 378.407, and 403.091, Florida Statutes (Fla. Stat.). Based on the SWO notification and inspection, potential violations of Chapters 373 and 403, Florida Statutes (“Fla. Stat.”), and Chapters 62-330 and 62-620, Florida Administrative Code (“Fla. Admin. Code”), were observed.

The Department conducted a file review of previous discharges at the Trail Ridge South facility and acknowledges receipt of the necessary information related to the spills.

Table 1. Wastewater Spills at Florida Mine – Trail Ridge South

Date	SWO#	Volume	Description
2/17/2025	2025-1502	230,000 gallons	An overflow of process water occurred at cell B-01 at the Trail Ridge South plant, to an adjacent wetland. Sampling results at the point of release indicated turbidity of 45.1 NTU. An earthen berm was constructed to block flow, and process water was pumped to the nearby Trail Ridge facility.
9/16/2024	2024-7995	1,200 gallons	On Saturday September 14, 2024, at approximately 11:00 a.m., an operator noticed accumulated

			stormwater in a tailings pit overtopping a berm with some water to the adjacent wetland.
7/29/2024	2024-6237	30,000 gallons	A discharge end of pipe blew off of a pump and caused approximately 30,000 gallons of process water to discharge into a previously mined upland area and into wastewater pond 1. Water then flowed into industrial wastewater ponds 2 and 3, and then to outfall D-001.
1/31/2024	2024-997	194,195 gallons	Approximately 194,195 gallons discharged off the mine’s boundary. Review indicated a “washout” by the active tailings line which caused water to flow back toward the reclamation cell. From the top soiled area, water left the site at an historic fire break and water from the northwest corner of the reclamation cell entered the adjacent offsite wetland system. Monitoring was conducted with the highest reading at 77 NTUs.
2/26/2023	2023-1701	228,000 gallons	Approximately 228,000 gallons discharge from Pond 1. The facility experienced a plant upset that exceeded the plant’s containment area. Water entered a stormwater pond and adjacent ditch system. An alum system was placed at the ditch to settle out solids. No sampling was initiated with the water being contained in the ditch system.
12/26/2022	2022-10599	510,000 gallons	Discharge of approximately 510,000 gallons. Water overflowed the concrete containment and entered the stormwater pond. It is estimated that water discharged from the stormwater pond for approximately four (4) hours. Water entered the adjacent historic ditch. Monitoring revealed turbidity readings in the ditch system up to 104 NTUs and below 10 NTUs offsite.

During the inspection, Department personnel noted the following:

- 1) Sediment deposition was observed into an adjacent wetland. Specific Condition 9 of the Environmental Resource Permit MMR_137482-018 (ERP) requires that best management practices for turbidity and erosion control shall be implemented and maintained to prevent siltation and turbid discharges outside of the disturbance area. The ERP does not authorize dredging or filling of wetlands or other surface waters outside the approved area of disturbance.
- 2) Improperly installed silt fencing was observed outside the area of discharge, indicating the best management practices are not being maintained as required by Specific Condition 9 of the ERP.

Florida Mine – Trail Ridge South
Facility ID No. FL0A00014
Warning Letter No. WL25-092
Page 3 of 3

- 3) The stormwater treatment system should be managed such that a 25-year, 24-hour storm event can be contained with appropriate freeboard as required by Specific Condition 10 of the ERP. The berms observed onsite did not appear to be constructed as required by Specific Condition 10 of the ERP.

Based on our review of the submitted information, a meeting or teleconference may be required. Please address your response and any questions to Ian Watkins at (904) 256-1573, or via e-mail at Ian.Watkins@FloridaDEP.gov.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), Fla. Stat. Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to Sections 403.121 and 403.161, Fla. Stat.

We look forward to your cooperation in completing our investigation and resolving this as soon as possible.

Sincerely,



Gregory J. Strong
District Director

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